

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
JUANA ORTIZ : CHAPTER 13  
Debtor :  
\*\*\*\*\*  
KINGDOM RCG EVERGREEN FUND :  
SERIES I LLC :  
Movant, :  
vs. :  
JUANA ORTIZ : CASE NO. 5-22-00155  
Respondents. :

\*\*\*\*\*  
**OBJECTION TO CERTIFICATION OF DEFAULT**  
\*\*\*\*\*

NOW COMES, Juana Ortiz, the above Debtors, by and through her counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. Movant filed a Motion for Relief from the Automatic Stay due to a default in monthly payments.
2. On April 9, 2025, Movant filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor is in the process of selling her home. Movant will be paid in full from sale of property.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the granting of relief from the automatic stay.

Respectfully submitted,

Date: April 11, 2025

/s/Tullio DeLuca  
Tullio DeLuca, Esquire

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on April 11, 2025 he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

Jennie C. Shnyder, Esq. at [jennie@dwaldmanlaw.com](mailto:jennie@dwaldmanlaw.com)

Date of Mailing: April 11, 2025

/s/Tullio DeLuca

Tullio DeLuca, Esquire